JOHN W. HUBER, United States Attorney (#7226) STEWART M.YOUNG, Assistant United States Attorney (#14377) STEPHEN L. NELSON, Assistant United States Attorney (#9547) Attorneys for the United States of America 111 South Main Street, Suite 1800

Salt Lake City, Utah 84111 Telephone: (801) 524-5682

Email: stewart.young@usdoj.gov

U.S. DISTRICT COURT

2018 MAY 23 P 12: 49

DISTRICT OF UTAM

PUTY CLERK

IN THE UNITED STATES DISTRICT COURT DISTRICT OF UTAH, CENTRAL DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

VS.

DANIEL SILVA (aka DMACK), ABRAHAM SANCHEZ, DOMINIC TRUJILLO, and FABIAN URIEL TAPIA-BUSTAMANTE,

Defendants.

The Grand Jury Charges:

<u>INDICTMENT</u>

VIOLATIONS:

Count 1: 21 U.S.C. §§ 841(a)(1) & 846: Conspiracy to Distribute Methamphetamine

Counts 2-3: 21 U.S.C. § 841(a)(1): Possession of Methamphetamine with Intent to Distribute

Count 4: 21 U.S.C. § 841(a)(1): Distribution of Methamphetamine

Count 5: 18 U.S.C. § 922(g)(1): Felon in Possession of a Firearm

Case: 2:18-cr-00264

Assigned To: Waddoups, Clark

Assign. Date : 5/23/2018

Description: USA v. Silva et al

COUNT 1

21 U.S.C. §§ 841(a)(1) & 846 (Conspiracy to Distribute Methamphetamine)

Beginning on a date unknown to the Grand Jury, but at least as far back as March 18, 2018, and continuing to on or about May 15, 2018, in the Central Division of the District of Utah, and elsewhere,

DANIEL SILVA (aka DMACK), ABRAHAM SANCHEZ,

DOMINIC TRUJILLO, and FABIAN URIEL TAPIA-BUSTAMANTE,

defendants herein, did conspire with other persons, both known and unknown to the Grand Jury, and with each other, to knowingly and intentionally distribute five hundred (500) grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, within the meaning of 21 U.S.C. § 812; all in violation of 21 U.S.C. § 841(a)(1) & 846, and punishable pursuant to 21 U.S.C. § 841(b)(1)(A).

COUNT 2

21 U.S.C. § 841(a)(1) (Possession of Methamphetamine with Intent to Distribute)

On or about April 23, 2018, in the Central Division of the District of Utah,

ABRAHAM SANCHEZ,

defendant herein, did knowingly and intentionally possess with intent to distribute five hundred (500) grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, within the meaning of 21 U.S.C. § 812; all in violation of 21 U.S.C. § 841(a)(1), and punishable pursuant to 21 U.S.C. § 841(b)(1)(A).

COUNT 4

21 U.S.C. § 841(a)(1) & 18 U.S.C. § 2 (Distribution of Methamphetamine)

On or about May 3, 2018, in the Central Division of the District of Utah,

DOMINIC TRUJILLO and FABIAN URIEL TAPIA-BUSTAMANTE, defendants herein, did knowingly and intentionally distribute fifty (50) grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, within the meaning of 21 U.S.C. § 812; and did aid and abet therein, all in

violation of 21 U.S.C. § 841(a)(1) and 18 U.S.C. § 2, and punishable pursuant to 21 U.S.C. § 841(b)(1)(B).

COUNT 4

21 U.S.C. § 841(a)(1) (Possession of Methamphetamine with Intent to Distribute)

On or about May 15, 2018, in the Central Division of the District of Utah,

DOMINIC TRUJILLO,

defendant herein, did knowingly and intentionally possess with intent to distribute five hundred (500) grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, within the meaning of 21 U.S.C. § 812; all in violation of 21 U.S.C. § 841(a)(1), and punishable pursuant to 21 U.S.C. § 841(b)(1)(A).

COUNT 5

18 U.S.C. § 922(g)(1) (Felon in Possession of a Firearm and Ammunition)

On or about May 15, 2018, in the Central Division of the District of Utah,

DOMINIC TRUJILLO,

the defendant herein, having been convicted of a crime punishable by imprisonment for more than one year, did knowingly possess in and affecting commerce, a firearm and ammunition, to wit: a Glock 26 Gen 4 (S/N VMW860) handgun and associated ammunition; all in violation of 18 U.S.C. § 922(g)(1).

NOTICE OF INTENT TO SEEK FORFEITURE

As a result of committing the felony offense alleged in Count 1 of this Indictment, which is punishable by imprisonment for more than one year, the above-named defendants shall forfeit to the United States pursuant to 21 U.S.C. § 853, any and all property, real or personal, constituting

proceeds deriving from violations of 21 U.S.C. §§ 841(a)(1) & 846, and pursuant to 21 U.S.C. § 853 any and all property, real and personal, used or intended to be used in any manner or part to commit and to facilitate the commission of a violation of 21 U.S.C. §§ 841(a)(1) & 846 and any property traceable thereto, including but not limited to the following:

- \$2,596.51 in U.S. Currency (found on Dominic Trujillo)
- \$8,550.51 in U.S. Currency (found at 5438 W. Heath Avenue)
- \$13,180.00 in U.S. Currency (found at 4438 Cherry Blossom Circle)

Additionally, as a result of the offense in Count 5, the defendants shall forfeit to the United States pursuant to 18 U.S.C. § 924(d)(1), the firearms and ammunition involved in or used in any knowing violation of 18 U.S.C. § 922 and 26 U.S.C. § 5861(d), including but not limited to the firearms listed in Count 5.

• A Glock 26 Gen 4 (S/N VMW860)

A TRUE BILL:

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FOREPERSON OF GRAND JURY

JOHN W. HUBER United States, Attorney

STEWART M. YOUNG STEPHEN L. NELSON

Assistant United States Attorneys